

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

R.I. SEEKONK HOLDINGS, LLC.

Plaintiff

VS.

C.A. No. 04 CV 11682 NMG

TIMOTHY P. McINERNEY, INDIVIDUALLY
AND IN HIS CAPACITY OF TOWN
ADMINISTRATOR of the TOWN OF
SEEKONK and TOWN OF SEEKONK
Defendants

JOINT MOTION TO EXTEND CERTAIN SCHEDULING ORDER DEADLINES

In the above-entitled matter, the parties jointly request this Honorable Court to extend the following lines of its current Scheduling Order, namely that:

- (3) all depositions be completed by 04/01/06.
- (4) all trial experts of the parties be disclosed by 03/01/06
- (5) all dispositive motions, including motions for summary judgment, are to be filed by 05/15/06 and responses by 06/15/06.

The parties participated in the adoption of the original scheduling order, but their joint obligations and the unusual circumstances of this matter make these changes imperative. Such amendments should not delay the final disposition of this case and no party will be prejudiced by these proposed changes, thus it is respectfully requested that this amendment to the existing order be allowed.

Respectfully Submitted,

Plaintiff,
By its attorney,

/s/ John B. Reilly
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Defendants,
By their attorney,

/s/ Jeremy Silverfine
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DATED: November 21, 2005